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**"The moral arc
of the universe
is long,
but it bends
toward justice"**

Reverend Martin
Luther King Jr.
[Where Do We Go
From Here?](#)
August 1966

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Maureen Sullivan

Director, Environmental Management

Office of the Deputy Under Secretary of Defense (Installations & Environment)

By e-mail at maureen.sullivan@osd.mil

Dear Ms. Sullivan:

The U.S. Navy's Environmental Program Management has decided to significantly reduce the frequency of some Restoration Advisory Boards (RABs) at former Navy installations, such as Treasure Island, Moffett Field and Alameda Naval Air Stations, in the San Francisco Bay Area. We believe that RAB schedules should be established in consultation with each RAB.

Historical perspective

In 1994, the Department of Defense (DOD) and the U.S. EPA jointly issued guidelines for implementing DOD's policy to increase community involvement in decisions regarding environmental cleanup at active and Base Realignment and Closure (BRAC) installations. In 2006, the Secretary of Defense published the RAB Rule (71 Federal Register 27610), which provides a framework for public participation in the restoration process and outlines the establishment, composition, funding, operations, adjournment and dissolution of RABs nationwide. RAB representatives are typically comprised of U.S. EPA; state, local, and tribal government officials, and the members of affected communities. In the Bay Area, most RABs have been meeting every other month.

The rule explains the purpose of RABs, including [Section 202.1(b) (3)] **"An opportunity for RAB members to review progress, participate in a dialogue with, and provide comments and advice to the installation's decision makers concerning environmental restoration matters. Installations shall give careful consideration to the comment provided by the RAB members."**

In addition, Section 202.7 states, **"Each RAB shall develop a set of operating procedures..." which include "(e) meeting frequency and location."**

Navy's recent decision

In the Fall of 2011, Navy management announced plans to reduce the frequency of Navy RABs without the input of any other stakeholder participants, including the U.S. EPA. While it may be appropriate to reduce RAB meeting frequency at some installations, RAB members were taken by complete surprise by this change. For example, the frequency of Alameda RAB meetings was recently reduced to quarterly. Navy representatives strictly enforced a two-hour time limit at a recent Alameda RAB meeting, even though the body completed discussion of only one substantive item out of many. Too much work is happening at such sites to limit public oversight to eight hours a year.

The Navy's Base Environmental Coordinators have conveyed the message to RAB members that the Navy wants to reduce costs in their environmental restoration program. Reducing the frequency of RAB meetings seems to be an easy way to do that.

However, we think that the costs for RAB meetings are quite minimal in relation to the overall budget of environmental restoration projects at these installations. We believe that limiting timely public input may actually cost the programs more than the minuscule savings.

Bay Area RAB community members are upset by the Navy's unilateral decision to eliminate RAB meetings across the board.

We recognize that some RABs are winding down as some environmental restoration programs are achieving cleanup milestones, but numerous installations have many more years of environmental work ahead and many decisions to make. Treasure Island, for example, has at least 15 active sites/operable units, each with a series of pending documents requiring review.

Both 17 years of tradition and the duly promulgated RAB Rule make it clear that RAB schedules should be established by each RAB. We urge you to direct Navy management to reverse its new policy and instead to consult with each RAB to establish a schedule which will maximize its ability to oversee constructively the Navy's cleanup decision-making and activities.

Respectively,

Saul Bloom, Executive Director

Lenny Siegel, Executive Director

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